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Attorneys for Creditors
MARINA GELMAN and MIKHAIL GELMAN

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case - Jointly Administered)

**AMENDED NOTICE OF HEARING ON
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY AND ABSTENTION
PURSUANT TO 28 U.S.C. 1334(c)(1);
OBJECTION TO THE BANKRUPTCY
COURT ADJUDICATING MOVANTS'
PERSONAL INJURY CLAIMS**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-3008 (DM).

Date: May 9, 2019

Time: 9:30 a.m.

Ctrm: Hon. Dennis Montali
450 Golden Gate Avenue
16th Floor, Courtroom 17
San Francisco, CA 94102

Objection Deadline: April 24, 2019
At 4:00 Pacific Time

1 TO THE DEBTORS AND OTHER INTERESTED PARTIES:

2 PLEASE TAKE NOTICE that on January 29, 2019 (the "Petition Date"), PG&E Corporation
3 and Pacific Gas and Electric Company, as debtors and debtors in possession (the "Debtors") in the
4 above-captioned Chapter 11 cases (the "Chapter 11 Cases"), each filed a voluntary petition for relief
5 under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") with the United
6 States Bankruptcy Court for the Northern District of California (San Francisco Division) (the
7 "Bankruptcy Court").

8 PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court will hold a hearing on **May**
9 **9, 2019, at 9:30 a.m. Pacific Time** (the "**Omnibus Hearing**") in the courtroom of the Honorable
10 Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden Gate
11 Avenue, San Francisco, California.

12 PLEASE TAKE FURTHER NOTICE that the previously noticed date for the hearing of the
13 motion of Creditors Marina Gelman and Mikhail Gelman ("the Gelmans") on April 24, 2019 on
14 their motion for relief from stay and abstention has been **rescheduled to May 9, 2019, at 9:30 a.m.,**
15 **Pacific Time**, during the **Omnibus Hearing**, before the Honorable Dennis Montali, United States
16 Bankruptcy Judge, in Courtroom 17 of the United States Bankruptcy Court, 450 Golden Gate
17 Avenue, 16th Floor, San Francisco, California, when the Bankruptcy Court will hear, in addition to
18 other matters, the motion of the Gelmans for the Court's Order:

19 1. Terminating, annulling, modifying, or conditioning the automatic stay of 11 U.S.C.
20 §362(a) to allow the Gelmans to prosecute to judgment their lawsuit for personal injury against the
21 Pacific Gas and Electric Company ("PG&E"), the City and County of San Francisco ("San
22 Francisco"), and Blue Plantain, LLC, pending in the San Francisco County Superior Court, Case
23 No. CGC-17-556763 ("the Lawsuit");

24 2. Abstaining pursuant to 28 U.S.C. § 1334(c)(1);

25 3. Providing that the 14-day stay prescribed by Federal Bankruptcy Rule 4001(a)(3)
26 shall not apply to the Court's order issued pursuant to this motion; and

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28 ///

1 4. For such other and further relief as this Court deems just and proper pursuant to this
2 motion.

3 The Gelmans object to the Bankruptcy Court being the forum for the trial of their personal
4 injury claims pursuant to 28 U.S.C. §157.

5 This motion is brought pursuant to 11 U.S.C. §362(d)(1) for cause. This motion is based
6 upon this Amended Notice, the Motion and Points and Authorities, the Request for Judicial Notice,
7 and the Declaration of David W. Wessel filed and served in support of this motion concurrently with
8 this Amended Notice, upon all other pleadings and papers on file herein, and upon such oral and
9 documentary evidence as may be presented by the Gelmans at the hearing on this motion.

10 Attached as Exhibit 1 to this Notice is the Gelmans' proposed form of the Order.

11 Pursuant to Local Rule 4001-1(a) respondent(s) opposing the motion shall appear personally
12 or by counsel at the preliminary hearing. Respondent(s) will not be required to, but may, file
13 responsive pleadings, points and authorities, and declarations for any preliminary hearing.

14 PLEASE TAKE FURTHER NOTICE that any oppositions or responses to the Motion must
15 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtors at the
16 above-referenced addresses so as to be received by **no later than 4:00 p.m. (Pacific Time) on**
17 **April 24, 2019.** Any oppositions or responses must be filed and served on all "Standard Parties" as
18 defined in, and in accordance with, the Amended Order Implementing Certain Notice and Case
19 Management Procedures entered on March 27, 2019 [Dkt No. 1093] ("Case Management Order").
20 **Any relief requested in the Motion may be granted without a hearing if no opposition is timely**
21 **filed and served in accordance with the Case Management Order.** In deciding the Motion, the
22 Court may consider any other document filed in these Chapter 11 Cases and related Adversary
23 Proceedings.

24 PLEASE TAKE FURTHER NOTICE that copies of the Amended Notice, the Motion and
25 its supporting papers can be viewed and/or obtained: (i) by accessing the Court's website at
26 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
27 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime
28 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for

1 U.S.-based parties; or +1 (929) 333-8977 for International parties or by email at:
2 pgeinfo@primeclerk.com. Note that a PACER password is need to access documents on the
3 Bankruptcy Court's website.

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5 Dated: April 10, 2019

LAW OFFICES OF BORIS E. EFRON

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7 /s/ David W. Wessel
8 Attorneys for Creditors
9 Marina Gelman and Mikhail Gelman
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EXHIBIT 1

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**ORDER FOR RELIEF FROM THE
AUTOMATIC STAY AND ABSTENTION
PURSUANT TO 28 U.S.C. 1334(c)(1)**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
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The motion of Marina Gelman and Mikhail Gelman ("the Gelmans") for relief from the automatic stay and abstention (the "Motion") came on for hearing before the Hon. Dennis Montali, United States Bankruptcy Court Judge, on May 9, 2019. The Court having considered all papers filed in support of the Motion and the _____ opposition, and upon due consideration, and good cause appearing,

1 **IT IS ORDERED** that the automatic stay is terminated as to the Gelmans who may take any
2 acts, or institute and/or complete any proceedings necessary to prosecute to judgment their lawsuit
3 for personal injury against Pacific Gas and Electric Company pending in the San Francisco County
4 Superior Court, Case No. CGC-17-556763 (“the Lawsuit”). The Court will abstain pursuant to 28
5 U.S.C. § 1334(c)(1) from hearing the Lawsuit.

6 **IT IS FURTHER ORDERED** that the 14-day stay provided by Federal Bankruptcy Rule
7 of Procedure 4001(a) (3) shall not apply to this Order.

8 **END OF ORDER**
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